

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

THY CHEA,

Plaintiff,

v.

CHAD WOLF, Acting Secretary, Department of Homeland Security; MATTHEW T. ALBENCE, Acting Director, U.S. Immigration and Customs Enforcement; MARCOS D. CHARLES, Acting Field Office Director, U.S. Immigration and Customs Enforcement Boston Field Office; MICHAEL POMPEO, Secretary, Department of State; in their official capacities.

Defendants.

Civil Action No. 19-12569-DPW

ASSENTED TO MOTION FOR THIRD EXTENSION OF TIME

NOW COME Defendants, by and through their attorney, Andrew E. Lelling, United States Attorney for the District of Massachusetts, and respectfully request this Court to extend the deadline for Defendants to file a responsive pleading for an additional fourteen (14) days, from February 12, 2020, to February 26, 2020. Defendants' deadline to respond to the Complaint was initially January 15, 2020. Defendants seek this extension of time to allow the parties to continue discussing a potential resolution of this case. On February 10, 2020, Plaintiff submitted Form I-131A, Application for Travel Document to the U.S. Embassy in Phnom Penh, Cambodia, and was interviewed based on the application. The adjudication of this application may obviate the need for further litigation. Opposing counsel has been contacted and has indicated her assent to this Motion.

WHEREFORE, the Defendants respectfully request that the Court extend by fourteen (14) days the date by which the Defendants must file a responsive pleading, or motion to dismiss under Fed. R. Civ. P. 12(b), up to and including February 26, 2020.

Respectfully submitted,

ANDREW E. LELLING
United States Attorney

By: /s/ Erin E. Brizius
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Dated: February 11, 2020

LOCAL RULE 7.1 CERTIFICATION

I hereby certify that, pursuant to Local Rule 7.1, I conferred with Plaintiff's counsel, and she assented to the relief requested in this Motion.

/s/ Erin E. Brizius
Erin E. Brizius
Assistant U.S. Attorney

Dated: February 11, 2020